

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BIGFOOT 4x4, INC.,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,  
LIMITED LIABILITY COMPANIES,  
PARTNERSHIPS AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED ON  
SCHEDULE A HERETO,

Defendants.

Case No. 22-cv-6758

Judge Martha M. Pacold

**MOTION FOR LEAVE TO FILE AN AMENDED SCHEDULE A**

Plaintiff BIGFOOT 4x4, INC. (“Plaintiff”), by and through its undersigned counsel, for its Motion for Leave to file an Amended Schedule A, states as follows:

1. On December 2, 2022, Plaintiff filed its Complaint in this case. [Dkt. No. 1].
2. Plaintiff now seeks leave to file an Amended Complaint and dismiss the following

Defendants with prejudice. Each party shall bear its own attorney’s fees and costs.

Defendant No. 17 “Cybiufam-US”

Defendant No. 18 “Majuexid-US”

Defendant No. 23 “bestdeals\_eu”

Defendant No. 26 “chengzhirc-us”

Defendant No. 36 “hydraulirc-66”

Defendant No. 55 “C9Dshop”

Defendant No. 57 “fashion sexy shopping”

Defendant No. 60 “Jekentib”

Defendant No. 65 “Mental rest”

Defendant No. 66 “NanYang NuoYa ShangMao”

Defendant No. 69 “Pingju Fashion Clothes CO.,”

Defendant No. 70 “ShenZhen XiaYang Trading Co.,Ltd.”

Defendant No. 80 “casualittier-US”

Defendant No. 83 “ClouDragon”

Defendant No. 85 “dengzhoushipengtengshangmaoyouxiangongsi”

Defendant No. 89 “Easycr”

Defendant No. 90 “EINKI”

Defendant No. 93 “Gobanana”

Defendant No. 94 “Gongloian-US”

Defendant No. 97 “HEPRISE HRK”

Defendant No. 98 “Hobby RC Store”

Defendant No. 101 “Jackssen”

Defendant No. 123 “Wecrun-US”

Defendant No. 144 “Posijego Shop”

Defendant No. 145 “QISIWOLE”

3. The Federal Rules of Civil Procedure provide in relevant part, that a plaintiff may amend its complaint with leave of Court. Federal Rule of Civil Procedure Rule 15(a)(2).

4. Courts generally grant leave to amend a pleading when justice so requires. Plaintiff submits that the filing of an Amended Schedule A to dismiss these Defendants is appropriate at this time for the matter to proceed. No motion is pending relative to these Defendants.

WHEREFORE, Plaintiff BIGFOOT 4x4, INC. moves this Honorable Court to enter an Order granting it leave to file an Amended Schedule A and dismiss these Defendants with prejudice.

DATED: February 22, 2023

Respectfully submitted,

BIGFOOT 4x4, INC.

By: s/ Michael A. Hierl  
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Attorneys for Plaintiff  
BIGFOOT 4x4, INC.

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Motion for Leave to File an Amended Schedule A was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on February 22, 2023.

s/Michael A. Hierl